

Michigan Department of Natural Resources

2005 Final Draft Internal Audit Reports

Compiled 9-11-05

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Atlanta Final Draft Internal Audit Report

FMU:Atlanta_____

Internal Audit Dates: 7/18 – 21/05_____

Internal Audit Report Date: 7/31/05_____

Lead Auditor: Jim Ferris_____

Internal Auditors: Mike Donovan, Steve Milford_____

Consultant: Craig Howard_____

Definitions:

Major Non-conformances: One or more of the Michigan Department of Natural Resource (MDNR) Sustainable Forest Certification Work Instruction requirements has not been addressed or has not been implemented to the extent that a systematic failure of the MDNR to meet a Sustainable Forest Certification (Sustainable Forestry Initiative or Forest Stewardship Council) principle, objective, performance measure or indicator occurs. (Adapted from the Sustainable Forestry Initiative Standard 2005-2009 Edition definitions.)

Minor Non-conformances: An isolated lapse in MDNR Sustainable Forest Certification Work Instruction implementation which does not indicate a systematic failure to consistently meet a Sustainable Forest Certification (SFI or FSC) principle, objective, performance measure or indicator. (Adapted from the Sustainable Forestry Initiative Standard 2005-2009 Edition definitions.)

Observations: Constructive examples, either negative or positive, of implementing MDNR Sustainable Forest Certification Work Instructions. Negative examples do not result in either major or minor non-conformances yet are important to document for determining trends between and among internal audits findings that could lead to major or minor non-conformances for the MDNR in an external Sustainable Forest Certification audit. Documenting selected positive examples, primarily unique or outstanding, provides evidence of excellent conformance to MDNR Work Instructions, serves to remind MDNR staff to mention during external audits and allows for determining trends between and among internal audits findings.

Work Instruction	Findings
General findings	Unit staff does not have a detailed understanding of the work instructions.
1.1 Strategic Framework for Sustainable Management	Major non-conformance: Work instruction states that a Statewide Management Guidance Document will be prepared. No such document was provided.
1.2 Mgmt Review	Observations: Unit is participating in internal audit. Minor non-conformance: Work instruction states that annual management reviews will be conducted to evaluate the results of internal audits. No management review has been conducted.
1.3 Eco-regional plan development	Observations: At the unit level there is evidence of coordinated planning efforts (KW, Devil's Lake, RP project, elk management plan). But there are also examples of planning efforts that are not well coordinated across all 3 divisions (River Assessments, FSHD Riparian Policy). Coordinated effort with other agencies on KW plan. Major non-conformance: Work instruction states that eco-regional plan development will be carried out for DNR State Forest lands. No eco-regional plan has been developed.
1.4 Biodiversity Management on State Forest Land	Observations: Pine barrens restoration project, Hungerford water beetle. Hunt Crk, pine barrens potential ERA's. Good evidence of managing for stand level biodiversity (snags, grouse drumming logs, lg leave trees). Minor non-conformance: Work instruction states that biodiversity management guidelines for cover types are to be used to determine how proposed management may impact the area. Staff did not demonstrate consistent use of stand level biodiversity guidelines. Minor non-conformance: Work instruction states that management in HCVA's must maintain or enhance the specific conservation values of the area. Field staff did not demonstrate consistent application of management in HCVA's, i.e. management in natural areas, Devil's Lake area, ADA trail. Many stands are coded stand condition 8 but it is not clear what the value is. (Rockport)
1.5 Social impact considerations	Observations: Conduct open houses & compartment reviews. Conducted public meetings for pine barrens burn impact, Rockport, Black Mountain, Devil's Lake.
1.6 FMU Analyses	Observations: WLD bio using personal notes to document landscape level thinking. Some important pieces of this analysis are being done, i.e. RP analysis, pine barrens, elk management plan Minor non-conformance: Work instruction states that the FMU will conduct a pre-inventory review of the next year of entry compartments to describe the condition of the forest in terms of age-class, cover

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Work Instruction	Findings
	type distribution, special management areas etc. An initial analysis has been done but the unit staff has not been made aware of it yet.
1.7 State Forest harvest trends	Major non-conformance: Work instruction states that the State Silviculturist will work with the Planning Unit Leader to develop an analysis of statewide timber availability and harvest trends. No evidence was available to indicate that the analysis has been done.
2.1 Reforestation	<p>Observations: Good awareness of work instruction. No problems w/ natural regeneration observed except in elk areas. Elk are considered when planning regeneration in elk areas, (smaller cuts). Potential regeneration problem exists at stand level. Need to see landscape level considerations in elk areas.</p> <p>Major non-conformance: Work instructions states that naturally regenerating stands will be checked four years after harvest to monitor regeneration success. No evidence was available to indicate that natural regeneration surveys have been done.</p>
2.2 Use of pesticides and chemicals on State Forest Land	<p>Observations: Chemicals used on ROW's are being reviewed and approved following work instruction.</p> <p>Minor non-conformance: Work instruction specifies that Special Use Permit (PR 1138E) is to be used to permit vegetation control measures on utility rights-of-way. ROW veg control for 2005 was permitted via letter from William O'Neill. The letter, dated April 19, 2005 (prior to the work instruction) specified use of Escort which is not included in the list of approved products in the work instruction.</p>
2.3 Integrated pest mgt and forest health (FH)	<p>Observations: Use of Kotar HT for ID pine barren sites. (PVcD).</p> <p>Major non-conformance: Work instruction states that consideration be should be given to the potential spread or increase of invasive exotic species. Staff did show awareness of spotted knapweed problems but no operational response to the problems was observed.</p> <p>Minor non-conformance: Work instruction states that responses to specific forest health issues like gypsy moth, emerald ash borer, and oak wilt are managed by the Forest Management Unit with technical direction and advice from the Forest Health Management Program Leader. IPM technical guidelines (EAB and BBD guidelines) to be provided by Forest Health Specialists were referenced but the staff did not have them yet.</p>
3.1 Forest Operations	<p>Observations: Good job protecting Devil's Lake, Rockport, Black Lake campground, however no evidence that the necessary tools to establish long term protection. There was evidence of communication between the unit, MNFI and SHPO.</p> <p>Minor non-conformance: Work instruction requires that FMFM, Wildlife and Fish Division review and approve all intrusive operations. Evidence of operations with sign-off approval from all three divisions was not available.</p> <p>Minor non-conformance: Work instruction requires documentation of areas of concern. Knowledge of some historical, cultural, and tribal sites was not sent to SHPO as required ("almost built a snowmobile trail through burial mounds").</p>
3.2 Water Quality BMP Non-Conformance Reporting	<p>Observations:</p> <p>Minor non-conformance: Work instruction states that DNR employees are required to report BMP problems. Sites with BMP problems were observed but only one had a completed reporting form (Van Hatten Creek culvert, Devil's Lake ORV trails).</p>
3.3 Road Closures	Observations: Directors Order to close ORV trail (Rattlesnake Mtn). Emergency road closure practice prior to the work instructions closely mimics the work instruction. Planning for road closures was seen relating to elk management areas.
5.1 Coordinate Nat Res	Observations: No unit level responsibility. Aware of research projects for FMFM, WLD & FSH.

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Work Instruction	Findings
Mgt Research	
6.1 Implementing Pub Info and Educational Opportunities on State Forests.	Observations: Active in public outreach efforts (career days, Turkey Fed, Twp board mtgs, Fire prevention programs). Adopt-a-forest program cleaned up 210 cu. yds of trash at Devil's Lake. ADA trail at Black Mtn.
6.2 Integrating Pubic Recreational Opportunities with mgt on State Forest lands	Observations: Ski trails, hiking, ORV use. Good planning of harvest job around ski trail, Black Mtn, Devil's Lk. Nice snowmobile bridge project. Major non-conformance: Integrating public recreational opportunities with management on state forest lands require (section 5) resource impacts as a result of recreational use be reported monitored and addressed. Inspection of illegal ORV trails (Black lake campground, north of Black Lake campground and on many other locations observed on July 19 and 20) confirmed illegal trails are common and damage is significant. DNR is not formally monitoring or addressing illegal ORV trails effectively. This was noted as a fatal flaw during the scoping audit of 2004.
6.3 SFI involvement and SFI State Implementation Comm.	Observations: No observations. Non-conformances:
7.1 Timber sale	Observations: Awareness of pre-sale checklist but no opportunity to use it yet. Previous use of visual impact checklist. Good timber sale contract inspection form but not using the "official" form. Minor non-conformance: Timber pre-sale checklist and sale administration work instruction (WAG 7) requires a pre-sale meeting with the stumpage purchasers and or logging crew to review the provisions of the timber sale contract that require special care and attention. Inspections on the site are required to use Field inspection report form (R4050). Direction provided in Timber sale contract for Little Ochequeoc Jack (Sale number 54-009-04-01) indicates the type of cut is final harvest on page 1, and then proceeds to provide different specifications within the section 2 (timber specifications), where a functional thinning or stand cleaning is described. The inconsistency in direction within the timber sale contract is a non-conformance. Minor non-conformance: Site inspections did not use form R-4050 as required in the work instruction to record observations. Minor non-conformance: Pre-sale checklist indicates specs for the contract. Management objective (MO) on the proposal did not match the MO in the inventory on Black Mtn Birch and Little Ochequeoc Jack. Minor non-conformance: DBH spec for leave trees is unenforceable. Minor non-conformance: Work instruction requires stumpage purchasers to wear personal protective equipment (PPE) on active timber sales. Crew members did not have hardhats on.
7.2 Contract administration	Observations: Contracts viewed seemed to be in place and in order.
8.1 Training	Observations: Training records were observed, staff knew how to get training records. Minor non-conformance: Work instruction states that supervisors will conduct annual training assessment and update individual training plans for individual employees. No evidence of training plans was observed.
9.1 Tribal Issues	Observations: Minor non-conformance: Work instruction requires the unit manager establish local communications with tribes. Unit manager did not have a tribal contact.

Baraga Final Draft Internal Audit Report

FMU: Baraga

Internal Audit Dates: 8/8 – 8/12

Internal Audit Report Date: 8/24/05

Lead Auditor: Mike Donovan

Internal Auditors: Eric Thompson, Jason Stephens, Thomas Haxby

Definitions:

Major Non-conformances: One or more of the Michigan Department of Natural Resource (MDNR) Sustainable Forest Certification Work Instruction requirements has not been addressed or has not been implemented to the extent that a systematic failure of the MDNR to meet a Sustainable Forest Certification (Sustainable Forestry Initiative or Forest Stewardship Council) principle, objective, performance measure or indicator occurs. (Adapted from the Sustainable Forestry Initiative Standard 2005-2009 Edition definitions.)

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Observations: Constructive examples, either negative or positive, of implementing MDNR Sustainable Forest Certification Work Instructions. Negative examples do not result in either major or minor non-conformances yet are important to document for determining trends between and among internal audits findings that could lead to major or minor non-conformances for the MDNR in an external Sustainable Forest Certification audit. Documenting selected positive examples, primarily unique or outstanding, provides evidence of excellent conformance to MDNR Work Instructions, serves to remind MDNR staff to mention during external audits and allows for determining trends between and among internal audits findings.

Work Instruction	Findings
General findings	Unit staff does not have a detailed understanding of the work instructions.
1.1 Strategic Framework for Sustainable Management	Observations: Statewide guidance document in draft received blessing of Statewide Council. Major Non-conformance: Knowledge of Work Instructions lacking. Global NCR applied.
1.2 Mgmt Review	Observations: Personnel who participated in the audit were very open and candid in their responses. Minor Non-conformance: Management review cycle has not been completed and a global NCR noted.
1.3 Eco-regional plan development	Observations: Some plans have been developed, i.e. Sturgeon Sloughs, interim ecosystem management guidelines which will be a part of the eco-regional plan. Progress noted in development of Eco-regional plan. No regional or landscape perspective apparent on roads development. Major Non-conformance: Lack of an eco-regional plan. Global CAR will require unit to document landscape inputs into compartment reviews.
1.4 Biodiversity Management on State Forest Land	Observations: Good functional stand level biodiversity. Following West U.P. interim management guidelines. Major Non-conformance: Ecological or social values not clearly identified for HCVA designations. OI Coding for stand condition 8 not consistent. Global NCRs applied.
1.5 Social impact considerations	Observations: Good web page. Multiple examples of where public input altered management. Need to consistently document responses to public comment. Need to consistently document changes in management as result of public input. Major Non-Conformance: Social criteria and indicators are not yet developed for Eco-Regional Plan, and few social C&Is are being monitored. Global NCR applied
1.6 FMU Analyses	Observations: Specialists have developed some age and species distribution analysis and Unit Manager has detailed analysis. Major Non-conformance: Not all of the analyses have been completed nor have they been presented as prescribed in work instructions. Global NCR applied.
1.7 State Forest harvest trends	Observations: No role was noted for the unit in this work instruction. Major Non-conformance: Global NCR applied.

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2.1 Reforestation	<p>Observations: Good awareness of work instruction. Excellent natural regeneration and recruitment observed in northern hardwood types. Less success in swamp conifer types. Natural regeneration log is being implemented, but appears somewhat incomplete.</p> <p>Minor Non-conformance: OI comments do not identify acceptable alternative regeneration, as per work instruction.</p>
2.2 Use of pesticides and chemicals on State Forest Land	<p>Observations: The only pesticides used on the forest in this unit are for power line R-O-W's. Chemicals used on R-O-W's are being reviewed and approved following work instruction.</p>
2.3 Integrated pest mgt and forest health (FH)	<p>Observations: Use of Kotar HT is limited for the purpose of determining silvicultural prescriptions and management objectives because of the seasonality of inventory and a lack of a comprehensive GIS layer for the WUP. Good work on using bio-controls for purple loosestrife control at Sturgeon Sloughs. Work instruction states that consideration should be given to the potential spread or increase of invasive exotic species. No direction on what species are acceptable for contractors to use when they are required to seed sites for stabilization of soils, leaving for opportunity of introducing exotic invasives.</p>
3.1 Forest Operations	<p>Observations: There is a good team approach to operations and use of SHPO and MNFI information. Unit has a shape file of archeological sites, however, it was noted that this has not been recently updated. Intrusive operations are not being approved by all divisions.</p> <p>Minor Non-conformances: Work instruction requires that FMFM, Wildlife and Fish Division review and approve all intrusive operations. Wildlife Division did not use FTPs on Baraga Plains waterfowl habitat work.</p>
3.2 Water Quality BMP Non-Conformance Reporting	<p>Observations: Unit has partially implemented the BMP non-conformance Reports. Unit had forms available in their vehicles. Tracking system in place.</p>
3.3 Road Closures	<p>Observations: A bridge along a DNR road is unsafe to vehicle or foot (ask Jim) traffic. This road should be closed using the emergency road closure procedure.</p> <p>Minor Non-conformances: Work instruction states that Unit Manager is to close roads with a public safety concern</p>
5.1 Coordinated Natural Resources Management Research	<p>Observations: No unit level responsibility. Aware of research projects for FMFM, WLD & FSH and cooperation with MTU on regeneration study.</p> <p>Minor Non-conformance: Work instruction States that Research leaders from DNR divisions will meet to discuss research needs and summarize research accomplishments. This meeting has not happened yet. Global NCR</p>
6.1 Implementing Pub Info and Educational Opportunities on State Forests.	<p>Observations: Good participation in school and public outreach programs.</p>
6.2 Integrating Pubic Recreational Opportunities with mgt on State Forest lands	<p>Observations: Unit is doing a good job of managing campgrounds, trails and hunting opportunities. (e.g. snowmobile trails, Baraga Plains, Sturgeon Sloughs)</p>
6.3 SFI involvement and SFI State Implementation Comm.	<p>Observations: No current Unit level role. Service forester aware of certification activities.</p>
7.1 Timber sale	<p>Observations: Unit is using the pre-sale checklist. Unit is following the new WI for timber sale inspection reports. Site inspections did not use form R-4050 as required in the work instruction to record observations. The new WI specifically allows use of notes other than R-4050 for ongoing inspections. R-4050 must be used to close payment unit and for final inspection. Wolf Birch sale was proceeding well and logging crew was using PPE. Logger is SFE certified.</p>

Baraga Final Draft Internal Audit Report

FMU: Baraga

Internal Audit Dates: 8/8 – 8/12

Internal Audit Report Date: 8/24/05

Lead Auditor: Mike Donovan

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7.2 Contract administration	Observations: Contracts viewed seemed to be in place and in order. Unit should clarify ownership on roads.
8.1 Training	Observations: Training records were observed, staff knew how to get training records. Minor Non-conformances: As per Global NCR, work instruction states that supervisors will conduct annual training assessment and update individual training plans for individual employees. No evidence of training plans was observed.
9.1 Tribal Issues	Observations: The Baraga Unit has done an outstanding job of working with the tribes on issues such as land exchanges and other management. Minor Non-conformances: Work instruction requires the unit manager establish local communications with tribes. Unit manager did not have a tribal contact. Global NCR applied.

Final Draft Report
Michigan DNR Forest Certification Internal Audit

FMU: **Cadillac**Internal Audit Dates: **7-25-05 – 7-29-05**Internal Audit Report Date: **7-29-05 (First Draft); 8-19-05 (Final Draft)**Lead Auditor: **Les Homan**Internal Auditors: **Kevin LaBumbard, Kerry Fitzpatrick**Audit Coach: **Bill Rockwell****Introduction:**

The internal audit of the Cadillac Unit was held during the week of July 25-29. The scope of the audit was the work instructions. The people directly responsible for work on the Unit were considered the auditees. On Monday, July 25, an opening meeting was held beginning at 12:30 PM. The internal audit team then interviewed Unit and District personnel and gathered documents and map information to assist in the field audit. The team visited field sites Tuesday through Thursday. The audit team and unit personnel held short meetings at the beginning and end of each field day to plan and debrief. A closing meeting was held on Friday July 29, 2005. The internal audit team de-briefed after the completion of the field days to review plans and develop preliminary findings. The audit team gathered evidence to determine work instruction conformance through interviews, document review and field observation.

Cadillac Unit personnel were very cooperative during the audit, and the large turnout of staff for the field visits was encouraging.

A detailed review of the findings by work instruction is listed below with observations (both positive and negative) and major and minor non-conformances (where evidence gathered did not show conformance). Two global issues for the Unit surfaced worth mentioning here since they cover all the work instructions:

- Cadillac Unit personnel need more exposure to the application of work instructions.
- The overall lack of landscape and ecoregional planning showed up in several non-conformances

Definitions:

Major Non-conformances: One or more of the Michigan Department of Natural Resource (MDNR) Sustainable Forest Certification Work Instruction requirements has not been addressed or has not been implemented to the extent that a systematic failure of the MDNR to meet a Sustainable Forest Certification (Sustainable Forestry Initiative or Forest Stewardship Council) principle, objective, performance measure or indicator occurs. (Adapted from the Sustainable Forestry Initiative Standard 2005-2009 Edition definitions.)

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Observations: Constructive examples, either negative or positive, of implementing MDNR Sustainable Forest Certification Work Instructions. Negative examples do not result in either major or minor non-conformances yet are important to document for determining trends between and among internal audits findings that could lead to major or minor non-conformances for the MDNR in an external Sustainable Forest Certification audit. Documenting selected positive examples, primarily unique or outstanding, provides evidence of excellent conformance to MDNR Work Instructions, serves to remind MDNR staff to mention during external audits and allows for determining trends between and among internal audits findings.

Work Instruction	Findings
1.1 Strategic Framework for Sustainable Management	<p>Observation:</p> <ul style="list-style-type: none"> • Staff have only had the work instructions for a short time. <p>Major Non-conformance:</p> <ul style="list-style-type: none"> • There is a lack of a statewide forest management guidance document, and minimal familiarity with the work instructions.
1.2 Mgmt Review	<p>Observation: Cadillac personal have been engaged in the management review process (as regards the audit).</p>
1.3 Eco-regional plan development	<p>Observations:</p> <ul style="list-style-type: none"> • Criteria & Indicators are being developed within the ecoregion. • A landscape level regional plan exists that includes the Cadillac Unit (Pere Marquette State Forest Plan - PMSFP). <p>Major Non-conformances:</p> <ul style="list-style-type: none"> • There is a lack of an ecoregional plan. • The PMSFP is not being fully implemented, especially regarding representative old growth

Cadillac Final Draft Internal Audit Report

Work Instruction	Findings
	<p>designation, submission of annual reports and semi-annual public meetings.</p> <p>Minor Non-Conformance:</p> <ul style="list-style-type: none"> • Key staff could not describe how unit and other plans interface with ecoregional plans, nor could they describe how ecoregional plans interface with statewide plans. • Key staff have a lack of understanding of roles and responsibilities for implementing the work instructions (writing ecoregional plans).
1.4 Biodiversity Management on State Forest Land	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> • Areas of DNR managed land that contain ecological or social values of significance have not been clearly defined. • Stands classified as potential old growth are not consistently coded as stand condition 8 in the OI database.
1.5 Social impact considerations	<p>Observation:</p> <ul style="list-style-type: none"> • Cadillac Unit personnel are involved in various public engagement processes, and respond to public questions and complaints. <p>Major Non-conformance:</p> <ul style="list-style-type: none"> • Social criteria and indicators are not yet developed (Eco-Regional Plan).
1.6 FMU Analyses	<p>Observations:</p> <ul style="list-style-type: none"> • The Cadillac district has initiated development of an FMU analysis process that is used during compartment review. • Post-prescription projections and implications have begun being developed for the unit. <p>Major Non-conformances:</p> <ul style="list-style-type: none"> • The Unit web page does not describe the unit's uniqueness, activities, and other characteristics. • Pre-inventory review and analysis is incomplete per work instructions (eg, no long term landscape-level perspective or tribal interest)
1.7 State Forest harvest trends	<p>Observation:</p> <ul style="list-style-type: none"> • No role was noted for the unit in this work instruction.
2.1 Reforestation	<p>Minor Non-conformance:</p> <ul style="list-style-type: none"> • Inadequate regeneration was noted on a northern hardwood sites(inadequate species diversity) and oak sites (oak regeneration not getting above small seedling size). <p>Major Non-conformance:</p> <ul style="list-style-type: none"> • Naturally regenerated stands are not systematically checked in four years. • An acceptable alternative species mix for stand regeneration is not consistently identified in OI comments.
2.2 Use of pesticides and chemicals on State Forest Land	<p>Observation:</p> <ul style="list-style-type: none"> • The interviewed unit certified applicator displayed extensive knowledge of the work instruction, including the proper use, containment, storage, and disposal of pesticides. <p>Minor Non-conformance:</p> <ul style="list-style-type: none"> • No documentation seen on pesticide spraying in utility right of way corridors. <p>Major Non-conformance:</p> <ul style="list-style-type: none"> • No pesticide application Plan (PAP) was prepared for any pesticide applications.
2.3 Integrated pest mgt and forest health (FH)	<p>Observations:</p> <ul style="list-style-type: none"> • There is evidence of using Kotar habitat typing in matching species to site. • Overall the unit demonstrates significant attention to forest health issues, including insect and disease management and fire protection. <p>Major Non-conformance:</p> <ul style="list-style-type: none"> • There is inadequate consideration being given to the potential and spread for invasive exotics in planning or operation of all treatments.
3.1 Forest Operations	<p>Major Non-conformance:</p> <ul style="list-style-type: none"> • Soil erosion/sedimentation is occurring into water bodies/rivers within the unit. • Documented approval by all divisions is not occurring on all intrusive operations (eg various use permits, some FTPs, and timber sales). • Forest Treatment Proposal Completion Reports are usually not completed.
3.2 Water Quality BMP Non-Conformance Reporting	<p>Observations:</p> <ul style="list-style-type: none"> • Some unit personnel are very knowledgeable about planning, design and installation of water and erosion control structures.

Cadillac Final Draft Internal Audit Report

Work Instruction	Findings
	<ul style="list-style-type: none"> The Unit has begun using the reporting forms and is in the process of developing a tracking spreadsheet as required in the work instructions.
3.3 Road Closures	<p>Major Non-conformance:</p> <ul style="list-style-type: none"> Unit personnel are not completing the road assessment checklist or the forest road trail proposal. <p>Minor Non-conformance:</p> <ul style="list-style-type: none"> Directors Orders are not always being obtained to close roads in non-emergency road closures.
5.1 Coordinate Nat Res Mgt Research	<p>Observation:</p> <ul style="list-style-type: none"> There is no Unit role in this work instruction, however research on controlled burns is being carried out in cooperation with unit staff.
6.1 Implementing Public Info and Educational Opportunities on State Forests.	<p>Observation:</p> <ul style="list-style-type: none"> Staff participates in various information and education programs.
6.2 Integrating Public Recreational Opportunities with mgt on State Forest lands	<p>Observation:</p> <ul style="list-style-type: none"> The unit provides many opportunities for public recreation. <p>Non-conformance</p> <ul style="list-style-type: none"> There is no eco-region recreation assessment or plan for the unit to integrate with.
6.3 SFI involvement and SFI Implementation Committee	<p>Observation:</p> <ul style="list-style-type: none"> There is no unit role in this work instruction.
7.1 Timber sale administration	<p>Observation:</p> <ul style="list-style-type: none"> Timber sale administration is being well documented on a local form developed by the unit. <p>Minor Non-conformance:</p> <ul style="list-style-type: none"> A chemical spill was noted on one active logging job in the unit. There was no SFE trained person on one active logging job in the unit. <p>Major Non-conformance:</p> <ul style="list-style-type: none"> The timber sale inspection report (R-4050) is not being used to document the completion of each payment unit.
7.2 Contract administration	<p>Observations:</p> <ul style="list-style-type: none"> Timber sales are offered nearly always in an open competitive bid process. Insurance and workers compensation laws are complied with and documented. Permit and other legal requirements are being complied with in construction projects. Use of 2 illegal scramble areas was eliminated by designating one legal scramble area and increasing enforcement. <p>Minor Non-Conformance:</p> <ul style="list-style-type: none"> Illegal campsites were noted along a tributary of the Manistee (Natural) River. Large 4x4 ORVs were rutting up an ORV trail.
8.1 Training	<p>Minor Non-Conformance:</p> <ul style="list-style-type: none"> Annual employee training plans are not developed for all divisions. <p>Major Non-conformances:</p> <ul style="list-style-type: none"> Documentation of training records from Lansing is incomplete.
9.1 Tribal Issues	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> The Unit has not established communication with local tribal contacts.

Gaylord Final Draft Internal Audit Report

FMU: Gaylord

Internal Audit Dates: July 25 to July 28, 2005

Internal Audit Report Date: July 28, 2005

Lead Auditor: Richard Stevenson

Internal Auditors: Bob Burnham, Gary Roloff

Audit Coach: Craig Howard

Introduction:

The internal audit was held during the week of July 25, 2005. The scope of the audit was the work instructions. The people directly responsible for work on the Unit were considered the auditees. On Monday, July 25 an opening meeting was held beginning at 12:30 PM. The internal audit team then interviewed Gaylord personnel and gathered documents and maps to assist in the field audit. The team visited three sites Monday afternoon. Numerous field visits were made on Tuesday, Wednesday, and Thursday morning. The internal audit team had morning briefings and a meeting each afternoon to review preliminary findings. The audit team collected evidence to determine work instruction conformance through conducting interviews, reviewing documents, and field observations. The internal audit team collected enough information to conduct a closing meeting by 1 PM, Thursday afternoon, July 28, 2005. It was agreed to experiment with reducing the Unit stress level by not identifying major and minor non-conformances this year.

Definitions:

Non-Conformances: Work instruction has not been properly implemented. Specific examples are given.

Conformances: Work instructions have been implemented, or Unit staff was already doing these things before the work instructions were written.

Observations: Constructive examples, either negative or positive, of implementing work instructions.

Opportunity for Improvement: These are areas where the letter of the work instruction is being fulfilled, but improvements in work processes are suggested.

Work Instruction	Findings
1.1 Strategic Framework for Sustainable Management	Non-conformances: Statewide Forest Management document does not exist.
1.2 Mgmt Review	Observations: Gaylord Unit personnel were fully engaged in the internal audit portion of the Management Review process. Non-conformances: The Management Review process has not been fully implemented.
1.3 Eco-regional plan development	Observations: Northern-lower Eco-regional planning team is formed, conducted their initial meeting, established a timetable and completion date (December 2007), and the team includes District representation that informs Unit personnel. -Too early to determine if organized structure supports information flow from the ground up.
1.4 Biodiversity Management on State Forest Land	Observations: Unit has mapped potential HCVAs and ERAs consistent with Work Instruction definitions. -HCVAs and POG were identified as stand condition 8 and were commented accordingly in the OI. -OI comments contain reference to MNFI data. Evidence of two-way interaction between the Unit and MNFI was observed. -Pre-field MNFI data queries are conducted. Have also conducted surveys for species of concern. -Within-stand biodiversity guidelines exist (based on Burgoyne and Theide memo, Reuschel memo, and Innovative Silviculture Workshop) and are included in the timber sale contract. Field observations indicate that within-stand biodiversity planning is being implemented. -High Conservation Value Area Management Guidelines document exists in draft form. Non-conformances: -Some Unit FMFM staff lacked familiarity on identifying and using the HCVA and ERA concepts.
1.5 Social impact considerations	Observations: -Compartment review record was examined and contained public comments and Unit responses. -Compartment review meetings were posted on web page. -The Work Instruction regarding social criteria and indicators does not apply until the Eco-regional planning document is complete.
1.6 FMU Analyses	Observations: -FMU-level analyses are occurring. Forest types and treatment projections are occurring and are

Gaylord Final Draft Internal Audit Report

Work Instruction	Findings
	<p>being used in both forest and wildlife management decisions. These projections include pre-YOE and post-prescription trends.</p> <p>-Non-conformances:</p> <p>-The detail of FMU analysis called for by the Work Instruction is not occurring (e.g., forest health, socio-economic).</p> <p>-The web page does not include the FMU analysis information as required by the Work Instruction.</p>
1.7 State Forest harvest trends	<p>Observations:</p> <p>-Preliminary unit-level analyses have been completed.</p> <p>Non-Conformance: Michigan State Forest Timber Availability and Harvest Trends report does not exist.</p>
2.1 Reforestation	<p>Observations: Artificial regeneration activities are not being documented in the OI comments consistently. TMS is working on a reference for adequate regeneration in northern hardwoods. The planting of exotics is not occurring.</p> <p>Non-conformances: OI comments regarding “acceptable species” mix is not yet happening. A system to track natural regeneration is not yet in place. FTP Completion Reports are not being consistently filled out.</p>
2.2 Use of pesticides and chemicals on State Forest Land	<p>Observations: PAP is being filled out to limit use of pesticides. The Eco-Regional plan may add merit to maintain red pine sites.</p> <p>Non-conformances: Spill Kits are not currently carried by DNR Applicators and associated workers. Workers Protection Standards are not being adhered to.</p>
2.3 Integrated pest mgt and forest health (FH)	<p>Observations: Timber sale contracts addressed forest health issues.</p> <p>-Good public literature at the Indian River office on invasive exotics.</p> <p>-Spotted knapweed is very common in the Unit. Spotted knapweed is a “prohibited plant” listed by the Michigan Department of Agriculture. This means this plant cannot be sown, grown (cultivated), or sold. In checking with MDA, there is no legal violation in having spotted knapweed growing on State Land, as long as it is not sown, (cultivated) or sold.</p> <p>Opportunity for Improvement: Forest Pests observations should be submitted on correct form.</p>
3.1 Forest Operations	<p>Observations: Unit is making efforts to address water quality issues in all phases of their operations.</p> <p>Non-conformances: Approval of intrusive operations is not occurring by all three Divisions (FMFM, WD, and FD). Rec. and ORV not always inquiring for SHPO or MNFI information.</p>
3.2 Water Quality BMP Non-Conformance Reporting	<p>Observations: Gaylord unit has begun to complete the report forms and tracking spread sheets.</p> <p>Opportunity for Improvement: The knowledge of the work instruction is not uniform, so some study is needed.</p>
3.3 Road Closures	<p>Observations: Work instruction is not well known.</p> <p>Non-conformances: Gaylord Unit staff are not familiar with the road closure procedures. They are not completing the road assessment checklist or the forest road trail proposal.</p>
5.1 Coordinate Nat Res Mgt Research	<p>Observations:</p> <p>-Does not appear to be a structured framework for proposing research questions to the Division (especially for Forest Management Division), though the perception of Unit personnel is that the information exchange is occurring both ways.</p> <p>-The Unit participates in research (gypsy moth plots, beech bark monitoring plots, emerald ash borer monitoring plots, ash decline study plots, elk radio telemetry project, coarse woody debris project).</p>
6.1 Implementing Pub Info and Educational Opportunities on State Forests.	<p>Observations: FOIA request procedures are not well understood among some field employees. Excellent examples of cooperative trash cleanups in Unit through Adopt-A-Forest. Public outreach and education are well done through Service Forester and through Fire Prevention, conservation groups, educational displays, and school programs.</p> <p>Conformances: Unit was doing a good job prior to work instruction development.</p>
6.2 Integrating Pubic Recreational Opportunities with mgt on State Forest lands	<p>Observations: We cannot find conformance at this time as there is no Eco-Regional Plan. Excellent ORV restoration sites near Big Creek and Old State Road. One illegal trail found-corrective action was immediately initiated. Good monitoring demonstrated overall on recreational facilities and on land use issues. Well maintained campgrounds and recreational trails. Noted unique mu le riding camp at Spring Brook.</p>
6.3 SFI involvement and SFI State Imp. Committee	<p>Observations: Unit Role is limited to 1-800 number.</p> <p>Non-conformances: Work Instructions are not well known among field staff.</p>
7.1 and 7.2 Timber sale and contract administration	<p>Observations:</p> <p>-BMP specs were in place and adhered to. Final inspections are being filled out and documented in the timber sale file.</p>

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Work Instruction	Findings
	<p>-Activity noted in violation of Kirtland Warbler habitat protection and disturbance requirements. Corrective action was implemented the same day by contacting Unit staff responsible for oil and gas leases who in turn checked the lease language (lease issued in 1990) for any warbler restrictions. The unit staff also contacted pertinent Lansing staff (FMFM Mineral Section and Wildlife Endangered Species Coordinator), contacted the lessee to explain the situation, and implemented corrective action by requiring an immediate cessation of activities.</p> <p>Non-conformances: Pre-sale meeting and checklist are not being implemented according to the work instruction. Illegal use not being reported to the Unit Manager (illegal hunting stands).</p>
8.1 Training	<p>Observations: All training records requested were received within the day of the request.</p> <p>Non-conformances: Training requirements are not being completely followed according to the work instruction. All employees do not have adequate training per job duty.</p> <p>Opportunity For Improvement: Make the training records available on-line for the employee and supervisor.</p>
9.1 Tribal Issues	<p>Observations: Tribes are being invited to the Open House and Compartment Review. A map of areas of interest was available from the tribe. 2008 compartments are going to be sent prior to field inventory. Tribal police cooperate with Law Enforcement on some sites used by Tribes.</p>

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FMU: **Gladwin**

Internal Audit Dates: **7-18-05 – 7-21-05**

Internal Audit Report Date: **7-21-05 (First Draft), 8-19-05 (Final Draft)**

Lead Auditor: **Les Homan**

Internal Auditors: **Greg Gatesy, Gary Roloff**

Audit Coach: **Tom Clark**

Introduction:

The internal audit of the Gladwin Unit was held during the week of July 18-21, 2005. The scope of the audit was the work instructions. The people directly responsible for work on the Unit were considered the auditees. On Monday, July 18, a detailed list of audit sites was selected based on interviews with the staff and an audit route was developed. An opening meeting was held beginning at 1:00 PM. The internal audit team then interviewed Unit and District personnel and gathered documents and map information to assist in the field audit. The team visited field sites during Tuesday and Wednesday. The audit team and unit personnel held short meetings at the beginning and end of each field day to plan and debrief. A closing meeting was held on Thursday July 21, 2005. The internal audit team de-briefed after the completion of the field days to review plans and preliminary findings. The audit team gathered evidence to determine work instruction conformance through interviews, document review and field observation.

Gladwin Unit personnel were very cooperative during the audit, and the large turnout of staff for the field visits was encouraging.

A detailed review of the findings by work instruction is listed below with observations (both positive and negative), conformances and non-conformances (where evidence gathered did not show conformance). A few global issues for the Unit surfaced worth mentioning here since they cover all the work instructions:

- Gladwin Unit personnel need more exposure to the application of work instructions.
- Land-uses designations are not clear in the unit as they relate to the new work instructions.
- Access control is an effective means of “protection” in the Gladwin Unit.
- The resource management guides (BMP Guide, Guidelines for Managing Dead Wood, silvicultural guides, Compleat Marker, Lowland Hardwood guide, MDNR universal access guidelines etc.) need a comprehensive review to ensure they are up to date, widely available, consistent with other DNR policy, and lastly, packaged in a modern user friendly format with a suitable professional appearance.

Definitions:

Major Non-conformances: One or more of the Michigan Department of Natural Resource (MDNR) Sustainable Forest Certification Work Instruction requirements has not been addressed or has not been implemented to the extent that a systematic failure of the MDNR to meet a Sustainable Forest Certification (Sustainable Forestry Initiative or Forest Stewardship Council) principle, objective, performance measure or indicator occurs. (Adapted from the Sustainable Forestry Initiative Standard 2005-2009 Edition definitions.)

Minor Non-conformances: An isolated lapse in MDNR Sustainable Forest Certification Work Instruction implementation which does not indicate a systematic failure to consistently meet a Sustainable Forest Certification (SFI or FSC) principle, objective, performance measure or indicator. (Adapted from the Sustainable Forestry Initiative Standard 2005-2009 Edition definitions.)

Observations: Constructive examples, either negative or positive, of implementing MDNR Sustainable Forest Certification Work Instructions. Negative examples do not result in either major or minor non-conformances yet are important to document for determining trends between and among internal audits findings that could lead to major or minor non-conformances for the MDNR in an external Sustainable Forest Certification audit. Documenting selected positive examples, primarily unique or outstanding, provides evidence of excellent conformance to MDNR Work Instructions, serves to remind MDNR staff to mention during external audits and allows for determining trends between and among internal audits findings.

Work Instruction	Findings
1.1 Strategic Framework for Sustainable Management	Major Non-conformance: <ul style="list-style-type: none">• There is no statewide forest management guidance document.• Unit Staff have minimal familiarity with the work instructions.
1.2 Mgmt Review	Observation: <ul style="list-style-type: none">• Gladwin personal have been engaged in the management review process (as regards the audit).
1.3 Eco-regional plan development	Observation: <ul style="list-style-type: none">• Criteria and Indicators are being developed within the ecoregion. Major Non-conformance: <ul style="list-style-type: none">• There is no eco-regional plan.

Gladwin Final Draft Internal Audit Report

Work Instruction	Findings
1.4 Biodiversity Management on State Forest Land	<p>Observations:</p> <ul style="list-style-type: none"> • A burn was added to an FTP that resulted in the conservation of some prairie plant populations. • Unit personnel work to increase within stand biodiversity by diversifying stand composition. <p>Major Non-conformances:</p> <ul style="list-style-type: none"> • Gladwin personal have not clearly defined areas of DNR managed land that contain ecological or social values of significance (eg wildlife floodings) • Not all HCVA stands are coded as stand condition 8 in the OI database (eg KW stands)
1.5 Social impact considerations	<p>Observation:</p> <ul style="list-style-type: none"> • Gladwin personnel are involved in various public engagement processes, and respond to public questions and complaints. <p>Non-conformances:</p> <ul style="list-style-type: none"> • Social criteria and indicators are not yet developed (Eco-Regional Plan). • No record of public comments or response to them exists in compartment review files.
1.6 FMU Analyses	<p>Observation:</p> <ul style="list-style-type: none"> • The Cadillac district has initiated development of an FMU analysis process that is used during compartment review. <p>Major Non-conformances:</p> <ul style="list-style-type: none"> • Pre-inventory review and analysis is incomplete per work instructions (no long term landscape-level perspective or tribal interest) • Post-prescription projections and implications are not being done. • Unit web page does not describe the unit's uniqueness, activities, and other characteristics.
1.7 State Forest harvest trends	<p>Observation:</p> <ul style="list-style-type: none"> • No role was noted for the unit in this work instruction.
2.1 Reforestation	<p>Observation:</p> <ul style="list-style-type: none"> • Field Checks reveal a general success of regeneration efforts. <p>Major Non-conformances:</p> <ul style="list-style-type: none"> • Naturally regenerated stands are not systematically checked in four years. • Alternative management objectives for stand regeneration were not identified in OI comments. <p>Note: There is a need to request a formal interpretation of the Sustainable Forestry Board (SFI governing body) regarding direct seeding timing conformance.</p>
2.2 Use of pesticides and chemicals on State Forest Land	<p>Observation:</p> <ul style="list-style-type: none"> • Anecdotal evidence suggests that the county is applying an unknown pesticide without permit in state forest campgrounds to combat mosquitoes. <p>Minor Non-conformance:</p> <ul style="list-style-type: none"> • No certified DNR pesticide applicator was on site during recent pesticide application.
2.3 Integrated pest mgt and forest health (FH)	<p>Observations:</p> <ul style="list-style-type: none"> • Very little evidence of recent forest health impacts. • Timber sales have specifications in them to deal with oak wilt and bark beetle infestation. <p>Major Non-conformance:</p> <ul style="list-style-type: none"> • No evidence of consideration being given to the potential and spread for invasive exotics in planning or operation of all treatments.
3.1 Forest Operations	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> • Documented approval by Fisheries and Wildlife Divisions is not occurring on all intrusive operations (eg various use permits, some FTPs). • Forest Treatment Proposal Completion Reports are usually not completed. <p>Minor Non-conformance:</p> <ul style="list-style-type: none"> • Unit staff do not document variances from BMP guidelines (eg road through buffer strip)
3.2 Water Quality BMP Non-Conformance Reporting	<p>Observations:</p> <ul style="list-style-type: none"> • Water crossings are generally well installed. • The Rifle River stream bank erosion inventory well documents erosion problems and recommends corrective actions. <p>Major Non-conformance:</p> <ul style="list-style-type: none"> • The Unit is not using the reporting forms or tracking spreadsheets as required in the work instructions.

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Work Instruction	Findings
3.3 Road Closures	Observation: <ul style="list-style-type: none"> There are many closed gated/bermed roads on the Gladwin Unit and the gates are effective. Major Non-conformances: <ul style="list-style-type: none"> Unit personnel are not completing the road assessment checklist or the forest road trail proposal. Directors Orders are not generally being obtained to close roads in non-emergency road closures.
5.1 Coordinate Nat Res Mgt Research	Observation: <ul style="list-style-type: none"> There is no Unit role in this work instruction, however staff are aware of research going on in their unit.
6.1 Implementing Public Info and Educational Opportunities on State Forests.	Observations: <ul style="list-style-type: none"> Public information signage was reportedly difficult to obtain and maintain. The Gladwin Unit ensures that public education and information presentations take place. Complaints regarding specific timber sales are regularly resolved and well documented.
6.2 Integrating Public Recreational Opportunities with mgt on State Forest lands	Observations: <ul style="list-style-type: none"> The Gladwin unit has demonstrated innovation in dealing with multiple ORV problems, HOWEVER, ORV PROBLEMS IN THE UNIT ARE OVERWHELMING. The Cadillac District is turning back grant money for ORV Restoration projects. There appears to be a lack of necessary staff to implement the program. Current designated ORV trails go through some ecologically unsuitable areas and DNR staff have been unable to resolve this issue. The county extended a road into a lake without any use permits, assessments or site amelioration. MajorNon-conformance: <ul style="list-style-type: none"> There is no eco-region recreation assessment or plan for the unit to integrate with, including allowance for increased recreation demand and particularly with ORVs.
6.3 SFI involvement and SFI Implementation Committee	Observation: <ul style="list-style-type: none"> There is no Unit role in this work instruction.
7.1 Timber sale administration	Observations: <ul style="list-style-type: none"> Timber sale administration is being well documented on a local form developed by the unit. Field observations of timber sales indicate that good consideration is given to aesthetics, wildlife, soil protection, and BMPs. Major Non-conformances: <ul style="list-style-type: none"> No record of qualifications of SFE trained foremen exists. The timber sale inspection report (R-4050) is not being fully used as specified in the work instruction. There is no evidence of monitoring of appropriate safety equipment utilization on logging sites. Gladwin Unit staff did not demonstrate knowledge of how to handle chemical spills on sales.
7.2 Contract administration	Observations: <ul style="list-style-type: none"> Unit actively reports illegal activities and addresses these problems quickly, HOWEVER, ORV PROBLEMS IN THE UNIT ARE OVERWHELMING Forest ownership boundaries are clearly established or harvesting does not proceed. Timber sales are offered nearly always in an open competitive bid process. Insurance and workers compensation laws are complied with and documented. Permit and other legal requirements are being complied with in construction projects.
8.1 Training	Major Non-conformances: <ul style="list-style-type: none"> Training requirements are not being completely followed according to the work instruction. <ul style="list-style-type: none"> Annual employee training plans are not developed. Documentation of training records from Lansing is incomplete. There is no annual training recommendation list.
9.1 Tribal Issues	Observation: <ul style="list-style-type: none"> The process on notifying SHPO of potential impacts to tribal sites and modifying treatments according to SHPO recommendations is working on the Gladwin Unit. Major Non-conformance: <ul style="list-style-type: none"> The Unit has not established communication with local tribal contacts.

Gwinn Final Draft Internal Audit Report
Final Draft Report – 8/18/2005
Michigan DNR Forest Certification Internal Audit

FMU: **Gwinn**

Internal Audit Dates: **7-11-05 – 7-15-05**

Internal Audit Report Date: **7-15-05 (First Draft); 8-18-05 (Final Draft)**

Lead Auditor: **Les Homan**

Internal Auditors: **Michael Donovan, Richard Stevenson**

Audit Coaches: **Tom Clark, Charles Levesque**

Introduction:

The internal audit of the Gwinn Unit was held during the week of July 11, 2005. The scope of the audit was the work instructions and the people directly responsible for work on the Unit were considered the auditees. On Monday, July 11 an opening meeting was held beginning at 12:00 PM and the internal audit team then interviewed Gwinn personnel and gathered documents and map information to assist in the field audit. The team visited one field site on that day. Numerous field sites were visited during Tuesday, Wednesday and Thursday of that week and a closing meeting was held on Friday, July 15, 2005. The internal audit team de-briefed each evening of the week. Each day, short meetings in the morning and at the end of the day were held to review plans and preliminary findings. The audit team gathered evidence to determine work instruction conformance through interviews, document review and field observation.

The Gwinn Unit personnel were very cooperative during the audit and are to be commended for their initiative, helpfulness and general interest in making the audit work.

A detailed work instruction by work instruction review of the findings is listed below with observations (thoughts both positive and negative), conformances and non-conformances (where evidence gathered did not show conformance). A few global issues for the Unit surfaced worth mentioning here since they cover all the work instructions (and are not repeated in the list below):

- While understandable given the time they have been available, generally the Gwinn Unit personnel do not know the work instructions or they are not known well enough.
- There are multiple documents providing guidance for different aspects of biodiversity management techniques. Precedence (as to which guidance document is most important) is not clear.

Definitions:

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Observations: Constructive examples, either negative or positive, of implementing MDNR Sustainable Forest Certification Work Instructions. Negative examples do not result in either major or minor non-conformances yet are important to document for determining trends between and among internal audits findings that could lead to major or minor non-conformances for the MDNR in an external Sustainable Forest Certification audit. Documenting selected positive examples, primarily unique or outstanding, provides evidence of excellent conformance to MDNR Work Instructions, serves to remind MDNR staff to mention during external audits and allows for determining trends between and among internal audits findings.

Work Instruction	Findings
1.1 Strategic Framework for Sustainable Management	Observation: <ul style="list-style-type: none">• The FMU seems to be following the overall mission, goals and objectives and legal framework for management. Major Non-conformance: <ul style="list-style-type: none">• The Strategic Framework is a non-conformance because of a lack of a strategic guidance document.
1.2 Mgmt Review	Observation: <p>Gwinn personal have been fully engaged in the management review process (as regards the audit).</p>
1.3 Eco-regional plan development	Observation: <ul style="list-style-type: none">• Evidence suggests that the FMU understands the value of eco-regional planning and are participating in the current effort to develop the plan and have followed an expired plan (Escanaba River State Forest Plan). Major Non-conformance: <ul style="list-style-type: none">• There is a lack of an eco-regional plan.

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Work Instruction	Findings
1.4 Biodiversity Management on State Forest Land	<p>Observations:</p> <ul style="list-style-type: none"> There are excellent field examples of in-stand biodiversity conservation conformance. There are also poor examples of this. While implementation of in-stand biodiversity techniques were demonstrated by field personnel, the objectives for these techniques are not well documented in the Operations Inventory process. The Gwinn Unit has coded the highest amount or among the highest amounts of potential old growth in the state. <p>Major Non-conformance:</p> <ul style="list-style-type: none"> There is a lack of understanding of management guidelines for proposed natural areas (Presque Isle). Special area designations are confusing and not understood well by staff (e.g. Waterfowl Project, the Sharptail Area, Blueberry Ridge).
1.5 Social impact considerations	<p>Observation:</p> <ul style="list-style-type: none"> The Gwinn Unit is involved in many public engagement processes. <p>Major Non-conformances:</p> <ul style="list-style-type: none"> Written comments received from the public are not presented at the Compartment Review and are not found in the Compartment file (the Compartment Record). Social criteria and indicators are not yet developed (Eco-Regional Plan).
1.6 FMU Analyses	<p>Observation:</p> <ul style="list-style-type: none"> Many of the FMU analyses are being accomplished (soils, topography, unique natural features, special management designations). <p>Major Non-conformance:</p> <ul style="list-style-type: none"> The FMU analysis as described in the work instruction is not being followed due to lack of some of the GIS data layers being available.
1.7 State Forest harvest trends	<p>Observation:</p> <ul style="list-style-type: none"> A Gwinn 2006 silvicultural overview occurred at the year of entry pre-inventory meeting. <p>Major Non-conformance:</p> <ul style="list-style-type: none"> Harvest trend analyses have not been completed and no report has been issued.
2.1 Reforestation	<p>Observations:</p> <ul style="list-style-type: none"> Field checks indicate a high degree of reforestation success on the Unit and artificial regeneration is typically accomplished within a two-year timeframe. A noteworthy accomplishment is that hemlock under-plantings were observed to address in-stand diversity. <p>Major Non-conformance:</p> <ul style="list-style-type: none"> An acceptable alternative species mix is not designated when making Operations Inventory prescriptions. Naturally regenerated stands are not systematically checked in four years. <p>Note: There is a need to request a formal interpretation of the Sustainable Forestry Board (SFI governing body) regarding direct seeding timing conformance.</p>
2.2 Use of pesticides and chemicals on State Forest Land	<p>Observations:</p> <ul style="list-style-type: none"> Other than contract utility corridor application, there is little to no use of pesticides in the Unit.
2.3 Integrated pest mgt and forest health (FH)	<p>Observation:</p> <ul style="list-style-type: none"> Overall, the Unit demonstrates significant attention to forest health issues, including insect and disease management and fire protection (e.g. storm damage salvage, monitoring, and harvest in reaction to jack pine budworm, use of Emerald Ash Borer ID kits in the campground program). <p>Major Non-conformance:</p> <ul style="list-style-type: none"> There is no evidence of consideration being given to the potential and spread for invasive exotics in planning or operation of all treatments.
3.1 Forest Operations	<p>Observations:</p> <ul style="list-style-type: none"> BMP implementation for water quality protection exemplary on the Unit with minor exceptions. There are three guidelines being used for riparian buffers (“Water Quality Mgt. Practices on Forest Land”, “Riparian Management Zone Guidelines”, and “Riparian Vegetation Protection – 2.02.011”). <p>Major Non-conformances:</p> <ul style="list-style-type: none"> Operations review requires approval by FMFM, Fisheries and Wildlife Divisions. Approval by all three Divisions is not presently occurring on intrusive operations.

Gwinn Final Draft Internal Audit Report

Work Instruction	Findings
	<ul style="list-style-type: none"> Forest Treatment Proposals Completion Reports are rarely completed.
3.2 Water Quality BMP Non-Conformance Reporting	Observation: <ul style="list-style-type: none"> The Unit is using the reporting forms and tracking spreadsheets required in the work instructions.
3.3 Road Closures	Observation: <ul style="list-style-type: none"> New roads on timber sales are generally closed. The Unit seldom closes other roads. Several well-executed road closures were noted on the Unit. Major Non-conformance: <ul style="list-style-type: none"> Work instruction is not understood and not being followed.
5.1 Coordinate Nat Res Mgt Research	Observation: <ul style="list-style-type: none"> There is no Unit role in this work instruction but some research special use permits are on file.
6.1 Implementing Public Info and Educational Opportunities on State Forests.	Observations: <ul style="list-style-type: none"> FOIA procedures are not known well below the Unit Manager level. The Gwinn Unit does a good job with public meetings and input and distributing information.
6.2 Integrating Public Recreational Opportunities with mgt on State Forest lands	Observation: <ul style="list-style-type: none"> The Unit has demonstrated outstanding integration of recreational opportunities with state forest land management. Major Non-conformance: <ul style="list-style-type: none"> There is a lack of an Eco-Regional Plan for recreation to be integrated with.
6.3 SFI involvement and SFI Implementation Committee	Observations: <ul style="list-style-type: none"> There is no Unit role in this work instruction.
7.1 Timber sale administration	Observations: <ul style="list-style-type: none"> Operators have been notified of recent changes in safety equipment requirements. Unit personnel performed well on timber sale administration (frequent timber sale visitation). Field observations of timber sales indicate that good consideration is given to aesthetics, wildlife, soil protection, and BMPs. The six-inch rutting specification used in Gwinn timber sale contracts may need to be re-worded. Major Non-conformances: <ul style="list-style-type: none"> No record of qualifications of SFE trained foremen exists. Timber sale inspection report is not being completed at the completion of each unit. There is no evidence of monitoring of appropriate safety equipment utilization on logging sites. Chemical spills (hydraulic fluid, oil) were identified on logging sites, and not being addressed.
7.2 Contract administration	Observations: <ul style="list-style-type: none"> Unit actively reports illegal activities and addresses these problems quickly. Forest ownership boundaries are clearly established or harvesting does not proceed. Timber sales are offered nearly always in an open competitive bid process. Insurance and workers compensation laws are complied with and documented. Minor Non-conformance: <ul style="list-style-type: none"> Sharecropper was operating without a contract.
8.1 Training	Observations: <ul style="list-style-type: none"> Training records requested from Division training officers were made available. Major Non-conformances: <ul style="list-style-type: none"> Training requirements are not being completely followed according to the work instruction. <ul style="list-style-type: none"> Annual employee training plans or lists of recommended training are not developed. Documentation of training records from Lansing is incomplete.
9.1 Tribal Issues	Major Non-conformances: <ul style="list-style-type: none"> The Unit has not established local communication with local tribal contacts. Minor Non-conformance <ul style="list-style-type: none"> It does not appear SHPO is notified regarding management activities that could affect sites of tribal interest (activities that have not been reviewed through the Compartment Review process).

Pigeon River Country Final Draft Internal Audit Report

Internal Audit Dates: July 11 – July 14, 2005

Draft Findings Date: July 14, 2005,

Revised July 22, 2005

Final Findings Date: August 24, 2005

Forest Management Unit: Pigeon River Country (PRC)

Internal Audit Team Members (Name, Division, Location):

Lead Internal Auditor: Kim Herman, Forest, Minerals, and Fire Management (FMFM), Marquette OSC

Internal Auditors: Steve Milford, FMFM, Crystal Falls Forest Management Unit (FMU); Don Mankee, FMFM, Baraga FMU; Kerry Fitzpatrick, Wildlife Division (WLD), Lansing

Definitions:

Major Non-conformances: One or more of the Michigan Department of Natural Resource (MDNR) Sustainable Forest Certification Work Instruction requirements has not been addressed or has not been implemented to the extent that a systematic failure of the MDNR to meet a Sustainable Forest Certification (Sustainable Forestry Initiative or Forest Stewardship Council) principle, objective, performance measure or indicator occurs. (Adapted from the Sustainable Forestry Initiative Standard 2005-2009 Edition definitions.)

Minor Non-conformances: An isolated lapse in MDNR Sustainable Forest Certification Work Instruction implementation which does not indicate a systematic failure to consistently meet a Sustainable Forest Certification (SFI or FSC) principle, objective, performance measure or indicator. (Adapted from the Sustainable Forestry Initiative Standard 2005-2009 Edition definitions.)

Observations: Constructive examples, either negative or positive, of implementing MDNR Sustainable Forest Certification Work Instructions. Negative examples do not result in either major or minor non-conformances yet are important to document for determining trends between and among internal audits findings that could lead to major or minor non-conformances for the MDNR in an external Sustainable Forest Certification audit. Documenting selected positive examples, primarily unique or outstanding, provides evidence of excellent conformance to MDNR Work Instructions, serves to remind MDNR staff to mention during external audits and allows for determining trends between and among internal audits findings.

Work Instruction	Findings
1.1 Strategic Framework for Sustainable Management	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> There is no Strategic Framework for Sustainable Management. <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> Staff were unfamiliar with Work Instructions and have not demonstrated their use, recognizing they have only had them for a short time. <p>Observations:</p> <ul style="list-style-type: none"> None
1.2 Management Review Process for Continual Improvement in the Management of Forest Resources	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> none <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> none <p>Observations:</p> <ul style="list-style-type: none"> PRC FMU is participating in annual Internal Audit Process. How will aspen regeneration success be measured – elk vs. timber objectives? Specify in overall FMU management goals and compartment review headers.
1.3 Eco-regional Plan Development	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> Ecoregional planning is not effectively coordinating several independent planning efforts. <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> There are some developed plans and guidelines that are not being followed completely, i.e. aspen management in the “Concept of Management”. Key staff could not describe how unit and other plans interface with ecoregional plans, nor could they describe how ecoregional plans interface with statewide plans. Key staff has lack of understanding of roles and responsibilities for implementing the

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Work Instruction	Findings
	<p>WI, i.e. writing ecoregional and statewide plans.</p> <ul style="list-style-type: none"> There are no landscape level goals for the cover type composition of the forest. <p>Observations:</p> <ul style="list-style-type: none"> DNR is currently updating the Concept of Management while the need to review and update the Elk Management Plan has been discussed with the Elk Management Work Group. The quick time frame for developing the PRC Concept of Management may preclude it from being coordinated with the Elk Management Plan revision. The Pigeon River Habitat Initiative shows a good example of large landscape scale planning and public-private partnership.
1.4 Biodiversity Management on State Forest Land	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> none <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> PRC FMU is not consistently coding Potential Old Growth and Special Management Areas as Stand Condition 8 with comments on values in OI. Not all staff were aware of the existence of some special management areas (natural areas), their values, management and monitoring needs. <p>Observations:</p> <ul style="list-style-type: none"> Awareness of threatened and endangered species protocols is good. Hardwood marking on the unit showed a definite concern for retention of snags, nesting trees, maintain structure – super canopy, large diameter trees and sub canopy species, i.e. white pine, red pine, hemlock, iron wood, hazel, mast species such as beech and oak. PRC FMU demonstrated examples of changing management objective from a monotype to mixed species and relying on natural regeneration to a great extent, i.e. Intersection Red Pine Timber Sale. Red Pine Initiative guidelines are being implemented, i.e. Intersection Red Pine Timber Sale. Method of cut for mixed species regeneration is increasing species diversity in mixed red pine and oak stands, i.e. Whippoorwill Timber Sale. New acquisition lands in cut over jack pine are being restored. Dam is in need of repair at Dog Lake Flooding/Natural Area.
1.5 Social Impact Considerations and Public Involvement Process	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> none <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> none <p>Observations:</p> <p>Outstanding documentation of incorporating public involvement in decision making and implementation.</p>
1.6 Forest Management Unit Analyses	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> PRC FMU is not doing FMU analysis and not using existing age-class distribution information to address imbalances for any species. <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> none <p>Observations:</p> <ul style="list-style-type: none"> PRC FMU analysis will be completed and utilized for upcoming Compartment Review.
1.7 State Forest Harvest Trends	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> Trends are not completed or available even though the unit is submitting monthly accomplishment reports. <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> none <p>Observations:</p> <p>None</p>

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Work Instruction	Findings
2.1 Reforestation	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> • none <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> • Difficulty in regenerating aspen due to elk browse, i. e. staff stated an average of 10% loss of regeneration due to elk over browse and “no regeneration” was not identified as an alternative. <p>Observations:</p> <ul style="list-style-type: none"> • Artificial regeneration monitoring is exceeding the requirements of the WI. • Natural regeneration surveys are not meeting work instruction requirement by the end of the fourth year. • The unit recognizes opportunities to utilize natural regeneration. • Demonstrated examples of changing management objective from a monotype to a mixed species and relying on natural regeneration to a great extent, i. e Intersection Red Pine Timber Sale.
2.2 Use of Pesticides and Chemicals on State Forest Lands	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> • Unit did not have spill kits to contain pesticide leaks or spills. • Variance has not been granted for use of Transline for control of knapweed. <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> • none <p>Observations:</p> <ul style="list-style-type: none"> • Reportedly pesticides may not be being stored properly per WI.
2.3 Integrated Pest Management and Forest Health	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> • There is no comprehensive plan for proactively managing the spread of forest pests and invasive exotic plants on state forestlands prior to their infestation. <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> • Unit lacks comprehensive divisional guidance for management of exotics such as emerald ash borer and beech bark disease in uninfected stands. <p>Observations:</p> <ul style="list-style-type: none"> • Staff are aware of non-native invasive exotics and are implementing control for some species...i.e. garlic mustard, WHIP for oil pad restoration and knapweed control.
3.1 Forest Operations	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> • FTP’s for Wildlife and Recreation projects are not being completed. • FTP’s outside of Compartment Review or outside compartment boundaries are not being routinely reviewed by the State Historic Preservation Officer. • Recreational facilities are being monitored for BMP’s but are not all being addressed. • Clarification is needed with interpreting ADA campground and recreational pathway requirements which have complicated efforts to implement BMP’s in recreational facilities. • Several sites have inadequate application of water quality BMP’s, i. e., active erosion into lakes, streams and rivers. <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> • Wildlife Division did not submit Forest Treatment Proposals or get inter-divisional approvals for road improvement projects across wetlands. <p>Observations:</p> <ul style="list-style-type: none"> • Fish Division is submitting FTP’s for intrusive projects. • FTP’s for grass opening maintenance may need updating pending WI clarification of definition of intrusive. • We observed very good remediation examples of priority sites.
3.2 Water Quality BMP-Non-Conformance Reporting	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> • none <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> • Staff have not begun using BMP non-conformance reports forms or tracking remedies for Water Quality Management Practices on Forest Lands. <p>Observations:</p>

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Work Instruction	Findings
	<ul style="list-style-type: none"> There are reports with prioritized Water Quality BMP sites in conjunction with public and private partners/stake holders. We observed very good remediation examples of priority sites.
3.3 Road Closures	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> none <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> none <p>Observations:</p> <ul style="list-style-type: none"> PRC FMU is implementing road closure plan.
5.1 Coordinated Natural Resource Management Research	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> none <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> none <p>Observations:</p> <ul style="list-style-type: none"> Several examples of past and ongoing department and university research on the FMU. Suggestion is to communicate examples to Division Research Coordinators.
6.1 Implementing Public Informational and Educational Opportunities on State Forests.	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> none <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> none <p>Observations:</p> <ul style="list-style-type: none"> Pigeon River Country FMU demonstrated on many levels how they include the public though many methods such as: advisory councils, public surveys, associations, interest groups, open houses, compartment reviews, web sites, and brochures. The Pigeon River Habitat Initiative is a good of example of support for private land programs per this WI.
6.2 Integrating Pubic Recreational Opportunities with Management on State Forest Lands	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> none <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> none <p>Observations:</p> <ul style="list-style-type: none"> The FMU provides and manages for many unique recreational opportunities.
6.3 SFI Involvement and the Michigan State Implementation Committee	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> none <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> none <p>Observations:</p> <ul style="list-style-type: none"> none
7.1 Timber Pre-sale Checklist and Sale Administration Procedures	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> Staff are not clear on what quantity or severity of equipment fluid spills constituted a reportable and remedial incident, i. e., evidence of spills in several locations at Intersection Red Pine and in DNR facilities. Work Instruction indicates any and all spills must be reported and remedied. Several observations of loggers and truckers not wearing necessary PPE. <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> Staff is aware of new inspection process but have not implemented. <p>Observations:</p> <ul style="list-style-type: none"> Staff is aware of pre-sale check list though has not have had an opportunity to implement.
7.2 Administration of Contracts	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> none <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> none <p>Observations:</p> <ul style="list-style-type: none"> Records are adequate.

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Work Instruction	Findings
8.1 MDNR Staff Training for State Forest Management	Major Non-conformances: <ul style="list-style-type: none"> • Training plans for most employees are not complete. Minor Non-conformances: <ul style="list-style-type: none"> • none Observations <ul style="list-style-type: none"> • Supervisor and employee were able to show training records.
9.1 Collaboration with Tribes in Regard to Management of State Forest Land.	Major Non-conformances: <ul style="list-style-type: none"> • none Minor Non-conformances: <ul style="list-style-type: none"> • none Observations: <ul style="list-style-type: none"> • PRC FMU has invited tribal representative to the upcoming open house and compartment review via letter and is prepared to follow-up if necessary.

General Comments: (Meant to provide context or generic observations related to the MDNR Sustainable Forest Certification Work Instruction Internal Audit findings.)

The Pigeon River Country Forest Management Unit (FMU) is unique. It is the only FMU with a formal Concept of Management and an ongoing relationship with a citizen advisory board. While the 32-year-old Concept of Management is under revision, its objectives have remained largely the same recognizing its major distinguishing characteristics. It will be the policy of the DNR to manage the Pigeon River Country to protect and maintain the natural beauty of its forests and waters, and to sustain a healthy elk herd, fish and wildlife populations. It is our observation that the Pigeon River Country Forest Management Unit is an example of a unit that manages well for biodiversity considerations and documents its public involvement.

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Internal Audit Dates: June 21- July 1, 2005

Draft Findings Date: July 1, 2005, Revised 7/20/05

Final Findings Date: 8/26/05

Forest Management Unit: Saulte Ste. Marie

Internal Audit Team Members (Name, Division): Jeff Stampfly (lead), Kim Herman (auditor), Jim Ferris (auditor), Bill Rockwell (consultant), Tom Clark (consultant)

Definitions:

Major Non-conformances: One or more of the Michigan Department of Natural Resource (MDNR) Sustainable Forest Certification Work Instruction requirements has not been addressed or has not been implemented to the extent that a systematic failure of the MDNR to meet a Sustainable Forest Certification (Sustainable Forestry Initiative or Forest Stewardship Council) principle, objective, performance measure or indicator occurs. (Adapted from the Sustainable Forestry Initiative Standard 2005-2009 Edition definitions.)

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Observations: Constructive examples, either negative or positive, of implementing MDNR Sustainable Forest Certification Work Instructions. Negative examples do not result in either major or minor non-conformances yet are important to document for determining trends between and among internal audits findings that could lead to major or minor non-conformances for the MDNR in an external Sustainable Forest Certification audit. Documenting selected positive examples, primarily unique or outstanding, provides evidence of excellent conformance to MDNR Work Instructions, serves to remind MDNR staff to mention during external audits and allows for determining trends between and among internal audits findings.

Work Instruction	Findings
1.1 Strategic Framework for Sustainable Management	Major Non-conformances: <ul style="list-style-type: none">Statewide Forest Management Guidance document has not been received by the Unit (Statewide NCR #1.1-1). Minor Non-conformances: <ul style="list-style-type: none">Work instruction training was provided to the Unit Managers and district staff the week before the audit. Training of unit staff in the work instructions did not occur until 7/7/05 (after the internal audit). (Statewide NCR # 1.1-2)
1.2 Management Review Process for Continual Improvement in the Management of Forest Resources	Observations: <ul style="list-style-type: none">Department is conducting internal audits as scheduled in the work instruction.
1.3 Eco-regional Plan Development	Major Non-conformances: <ul style="list-style-type: none">Coordinated eco-regional planning for elements such as wildlife, timber, recreation and overall transportation systems is not evident in any sort of consistent manner on the Unit. There is evidence good Unit level planning in areas such as the Strickler Road Grouse Mgt Area and the Munuscong Bay Project are not integrated into Ecoregional planning. This lack of planning is leading to an overall lack of management in areas such as the Maxton Plains and Clay Pits Area. Wildlife Division goals for aspen age-class and spatial distribution are unclear at the eco-regional level. (Statewide NCRs # 1.3-1 through 1.3-3)
1.4 Biodiversity Management on State Forest Land	Major Non-conformances: <ul style="list-style-type: none">There is evidence, both on the Maxton Plains and Little Brevort Natural Area, that Unit staff do not have a clear understanding of the laws and requirements of High Conservation Value Areas (HCVA) or Ecological Reference Areas (ERA).<ul style="list-style-type: none">The lack of management, protection and monitoring of the sites mentioned

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Work Instruction	Findings
	<p>threatens the values these sites were reserved to protect. (Statewide NCR # 1.4-1 & NCR # 1.4-3, Unit Level NCR #1.4-1)</p> <ul style="list-style-type: none"> Because of several factors, including the lack of training at the Unit level, the documentation of monitoring has not been implemented. (Statewide NCR # 1.4-1, Unit Level NCR # 1.4-1) There was evidence from multiple sites that stand-level biodiversity measures (snags and coarse woody debris) were not being applied as per 1996 Guidelines for Managing Deadwood to Enhance Biological Diversity. (Statewide NCR #1.4-4)
1.5 Social Impact Considerations and Public Involvement Process	<p>Observations:</p> <ul style="list-style-type: none"> Public open houses and compartment reviews are not well attended, but are held in accordance with the Operations Inventory Manual and work instructions. Additional public meetings have been held on specific topics as needed, such as at Trout Lake. There was evidence of other public involvement processes such as partnerships with several groups on the Munuscong Bay Project and Strickler Grouse Mgt Area.
1.6 Forest Management Unit Analyses	<p>Minor Non-conformances:</p> <ul style="list-style-type: none"> While some existing analyses (i.e. red pine and aspen) are being carried out, they do not appear coordinated or consistently applied across the Unit (Naubinway demonstrated application and Soo did not). It is difficult to observe incorporation of these analyses into field level management. Because there are two Statewide NCRs (#1.6-1 and 1.6-4) that address analyses on the Unit, a Unit specific NCR was not be issued for this finding. <p>Observations:</p> <ul style="list-style-type: none"> Unit does have an encompassing web page that appears to meet the work instruction. Naubinway is implementing the results of FMU analyses with respect to red pine and aspen.
1.7 State Forest Harvest Trends	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> There was no evidence that this work instruction has been implemented at the level detailed in the work instruction. (Statewide NCR # 1.7-1)
2.1 Reforestation	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> * The work instruction requirement for natural regeneration and harvest-date tracking has not been implemented on the Unit. (Statewide NCR # 2.1-1) Alternate silvicultural objectives resulting from harvests were not identified as part of compartment review. (Statewide NCR #2.1-1)
2.2 Use of Pesticides and Chemicals on State Forest Lands	<p>Observations:</p> <ul style="list-style-type: none"> Overall the intent of this work instruction is being met.
2.3 Integrated Pest Management and Forest Health	<p>Minor Non-conformances:</p> <ul style="list-style-type: none"> While Unit staff did demonstrate knowledge of invasive exotic species and their effects on the ecosystem, they were not taking measures to control potential spread of some species (i.e. leafy spurge, spotted knapweed) during forest operations (timber sales, borrow pits). (Statewide NCR # 2.3-1) <p>Observations:</p> <ul style="list-style-type: none"> Other species, such as garlic mustard, are actively sought out and control measures applied.
3.1 Forest Operations	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> * All divisions are not reviewing and approving all intrusive operations. As an example, event permits may not be reviewed or approved by Fisheries or Wildlife Division. (Statewide NCR #3.1-1) There were numerous sites that demonstrated a lack of monitoring and following through of historical road projects and overall road system monitoring. Evidence ranged from minor problems that exist now, to possibly major problems that would develop from a significant wet weather event (i.e. bridge approach to Davenport Creek and plugged culvert en route to Hog Island culvert stop). Issued Unit Level NCR # Soo 3.1-1 on 8-26-05. <p>Minor Non-conformances:</p> <ul style="list-style-type: none"> It appeared there are multiple versions of the BMP manual and beaver policy being

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Work Instruction	Findings
	<p>followed. Issued Unit Level NCR # Soo 3.1-2 on 8-26-05.</p> <ul style="list-style-type: none"> Knowledge of BMP application along intermittent streams is not adequate and ORV trails were discovered in the Riparian Management Zone. Issued Unit Level NCR # Soo 3.1-3 on 8-26-05. Not all forest operations go through compartment review and therefore are not consistently reviewed by SHPO, HAL or MNFI. DEQ is relied upon for some of this review. (Statewide NCR # 3.1-1)
3.2 Water Quality BMP-Non-Conformance Reporting	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> * BMP Non-Conformance Report Form has not been implemented. There was no evidence of a method to track BMP issues (BMP Tracking Spreadsheet). (Statewide NCR # 3.2-1) <p>Observations:</p> <ul style="list-style-type: none"> Staff training of work instructions had not occurred by internal audit date. There is some, ad-hoc recording of BMP complaints, but it is not well documented.
3.3 Road Closures	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> Road Closure work instruction has not been implemented. Examples include illegal ORV trails (roads?), deeply rutted jeep trails at Bass Cove Hardwood and Clay Pits. (Statewide NCR # 3.3-1) <p>Observations:</p> <ul style="list-style-type: none"> Staff training of work instructions had not occurred by audit date. It appeared there was some staff knowledge on how to close roads using existing procedures.
5.1 Coordinated Natural Resource Management Research	<p>Observations:</p> <ul style="list-style-type: none"> The summary report required under this work instruction is not due until 12-15-05. There is research occurring within the Unit and staff is unaware of the results.
6.1 Implementing Public Informational and Educational Opportunities on State Forests	<p>Observations:</p> <ul style="list-style-type: none"> There was evidence through interviews that responses from public requests were responded to in a timely manner.
6.2 Integrating Public Recreational Opportunities with Management on State Forest Lands	<p>Minor Non-conformances:</p> <ul style="list-style-type: none"> Not all aspects of the monitoring portion of the work instruction are implemented. (Statewide NCR # 6.2-1) <p>Observations:</p> <ul style="list-style-type: none"> Interviews revealed several partnerships that are on-going on a regular basis to assist the Unit in resource mgt.
6.3 SFI Involvement and the Michigan State Implementation Committee	<p>Observations:</p> <ul style="list-style-type: none"> Knowledge of DNR involvement with the SFI State Implementation Comm. Was not demonstrated on the Unit.
7.1 Timber Pre-sale Checklist and Sale Administration Procedures	<p>Major Non-conformances:</p> <ul style="list-style-type: none"> No evidence of a pre-sale meeting or checklist insuring OI prescriptions are carried through sale prep and timber sale administration. (Statewide NCR # 7.1-1) There were several instances of prescriptions not being carried through (i.e. hemlock cut at Cedar Ridge Aspen). Issued Unit Level NCR # Soo 7.1-1 on 8-26-05. Timber sale administration inadequate. Average time of several inspections was very long (3 months in some cases). This lack of frequency led to contract problems. Issued Unit Level NCR # Soo 7.1-1 on 8-26-05. Timber sale enforcement of specification language is not consistent and does not match what is occurring on the sale (safety & snags). Issued Unit Level NCR # Soo 7.1-1 on 8-26-05. Timber sale specifications for spills were not enforced. DNR contract language is the guiding standard here, not the Department of Environmental Quality's enforcement policy (Statewide NCR # 7.1-2) Purchasers have not been notified of Chain of Custody issues. (Statewide NCR # 7.2-1)

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Work Instruction	Findings
	Minor Non-conformances: <ul style="list-style-type: none"> Road construction was not minimized in all cases i.e. by-pass road at Bass Cove Hardwood. (Statewide NCR #7.1-1) Observations: <ul style="list-style-type: none"> BMP specifications on some sales did not adequately address work that needed to be performed and the work performed was not well documented (i.e. culverts on Stringham Lake). Staff is not clear about how BMP standards should be applied for roads across private land accessing state timber sales, i.e. culverts at Stringham Lake access road. Some loggers demonstrated a better understanding of road and BMP work than others. Loggers interviewed had some awareness of SFE training requirements.
7.2 Administration of Contracts	SEE NOTE BELOW
8.1 MDNR Staff Training for State Forest Management	Major Non-conformances: <ul style="list-style-type: none"> Training policy is not being followed as outlined in the work instruction. (Statewide NCR # 8.1-1) Observations: <ul style="list-style-type: none"> Training records were obtained from the Training Officer within the time requested. Record history only went back a few years.
9.1 Collaboration with Tribes in Regard to Management of State Forest Land	Observations: <ul style="list-style-type: none"> Communications with tribes have been initiated through the tribal coordinator. Unit has worked cooperatively with Great Lakes Fish and Wildlife Commission on the Munuscong Bay Project.

General Comments: (Meant to provide context or generic observations related to the MDNR Sustainable Forest Certification Work Instruction Internal Audit findings.)

When the draft audit report was originally provided at the closing meeting, Work Instructions 7.1 and 7.2 were combined for reporting purposes. In this template, they have been separated, but all of the findings are listed under 7.1.

Final Draft Audit Comments:

* Unit has indicated that it has implemented the work instruction (WI DEFICIENCY ACTIONS SSM MU dated 8-15-05).